

ELIZABETH M. PIPKIN (243611)
ANN M. RAVEL (62139)
McMANIS FAULKNER
50 West San Fernando Street, 10th Floor
San Jose, CA 95113
Telephone: (408) 279-8700
Facsimile: (408) 279-3244
epipkin@mcmanislaw.com
aravel@mcmanislaw.com

MARC A. WALLENSTEIN (*pro hac vice*)
GEORGE A. ZELCS (*pro hac vice*)
CHAD E. BELL (*pro hac vice*)
RYAN Z. CORTAZAR (*pro hac vice*)
PAMELA I. YAACOUB (*pro hac vice*)
KOREIN TILLERY LLC
205 North Michigan Avenue, Suite 1950
Chicago, IL 60601
Telephone: (312) 641-9750
Facsimile: (312) 641-9751

GLEN E. SUMMERS (176402)
KARMA M. GIULIANELLI (184175)
LINDLEY J. BRENZA (*pro hac vice*)
JONATHAN JACOB MARSH (*pro hac vice*)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Telephone: (303) 592-3100

CAROL L. O'KEEFE (*pro hac vice*)
MICHAEL E. KLENOV (277028)
KOREIN TILLERY LLC
505 North Seventh Street, Suite 3600
St. Louis, MO 63101
Telephone: (314) 241-4844
Facsimile: (314) 241-3525

*Attorneys for Plaintiffs Joseph Taylor,
Mick Cleary, and Jennifer Nelson*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOSEPH TAYLOR, MICK CLEARY, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Virginia K. DeMarchi

Pursuant to Civil Local Rule 79-5(f), Plaintiffs submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed with respect to Plaintiffs' Motion for Stay and supporting materials. The documents and/or portions of documents that have been designated by Defendant Google LLC as "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order entered on August 6, 2024 (ECF 107) in this matter, and which Plaintiffs seek to provisionally file under seal, are listed below:

Document	Portions to be Sealed
Ex. 5 to Declaration of Chad E. Bell in Support of Plaintiffs' Motion for Stay, <i>Csupo v. Google</i> Decert & Recert Order	Document in its entirety
Ex. 6 to Declaration of Chad E. Bell in Support of Plaintiffs' Motion for Stay, <i>Csupo v. Google</i> Expert Exclusion Order	Document in its entirety
Ex. 9 to Declaration of Chad E. Bell in Support of Plaintiffs' Motion for Stay, <i>Csupo v. Google</i> Plaintiffs' Opp to JNOV	Document in its entirety

Pursuant to Civil Local Rule 79-5(d), Plaintiffs provisionally file under seal unredacted copies of these materials. Plaintiffs provide notice to Google that these materials will be placed in the public court file unless Google timely files its statement and/or declaration in support of sealing. *See* Civil Local Rules 79-5(f)(3); 79-5(c)(1). Plaintiffs reserve the right to oppose any submission Google makes under Civil Local Rule 79-5(f)(3). *See* Civil Local Rule 79-5(f)(4).

1 Dated: August 29, 2025

Respectfully submitted,

2 KOREIN TILLERY LLC

3 /s/ Chad E. Bell

4 Marc A. Wallenstein (*pro hac vice*)

George A. Zelcs (*pro hac vice*)

5 Chad E. Bell (*pro hac vice*)

Ryan Z. Cortazar (*pro hac vice*)

6 Pamela I. Yaacoub (*pro hac vice*)

KOREIN TILLERY LLC

7 205 North Michigan Avenue, Suite 1950

Chicago, IL 60601

8 Telephone: (312) 641-9750

9 Facsimile: (312) 641-9751

10 Carol L. O'Keefe (*pro hac vice*)

Michael E. Klenov (277028)

11 KOREIN TILLERY LLC

505 North Seventh Street, Suite 3600

12 St. Louis, MO 63101

Telephone: (314) 241-4844

13 Facsimile: (314) 241-3525

14 Glen E. Summers (176402)

Karma M. Giulianelli (184175)

15 Lindley J. Brenza (*pro hac vice*)

Jonathan Jacob Marsh (*pro hac vice*)

16 BARTLIT BECK LLP

1801 Wewatta Street, Suite 1200

17 Denver, CO 80202

18 Telephone: (303) 592-3100

19 Elizabeth M. Pipkin (243611)

Ann M. Ravel (62139)

20 McMANIS FAULKNER

50 West San Fernando Street, 10th Floor

21 San Jose, CA 95113

22 Telephone: (408) 279-8700

23 Facsimile: (408) 279-3244

24 *Attorneys for Plaintiffs Joseph Taylor,*

Mick Cleary, and Jennifer Nelson